

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:)
) CHAPTER 13
GARY THOMAS STEVENS,)
MICHELLE HUETTER STEVENS,) CASE NO. **14-69570 - LRC**
)
Debtors.)
)

GARY THOMAS STEVENS)
MICHELLE HUETTER STEVENS,)
)
Movants,)
)
v.)
)
OCWEN LOAN SERVICING , LLC.)
)
Respondent.)

MOTION TO APPROVE LOAN MODIFICATION

This is Motion to modify Borrower's mortgage and if required modify section 362 automatic stay to enter said agreement. Movant seeks an entry of order approving loan modification to which parties have agreed to.

1.

Respondent services loan on 1476 Fallsbrook Court NW, Acworth, GA 30101.

2.

On November 28th 2016 Respondent and Movant agreed to modification.

3.

Parties believe that modification is in Debtors' best interest and Movant seeks Order granting modification and recordation of Modification and any other documents necessary to consummate modification.

4.

Upon approval Chapter 13 may cease funding Respondent's pre-petition claim and Respondent may amend accordingly.

5.

Wherefore Movant prays for entry of Order allowing Debtor to modify the mortgage on their principal residence and modification of section 362 in order for parties to enter into Modification Agreement.

Respecfully Submitted:

This 28th day of December, 2016.

125 Townpark Dr. Ste. 300
Kennesaw, GA 30144

PURCELL LAW FIRM, P.C.,

/s/ _____
Matthew E. Purcell
Attorney for Debtor
State Bar # 159093

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NOTICE OF ASSIGNMENT OF HEARING

NOTICE IS HERBY GIVEN that the hearing on the Debtors' **MOTION TO APPROVE LOAN MODIFICATION**, will be held in the above styled matter shall be held in

Courtroom 1204, U.S. Courthouse, 75 Spring St., S.W., Atlanta, GA at **1:45 p.m.**, on the **26th** day of **January, 2017**

This 28th day of December, 2016.

125 Townpark Dr. Ste. 300
Kennesaw, GA 30144

PURCELL LAW FIRM, P.C.,
/s/ _____
Matthew E. Purcell
Attorney for Debtor
State Bar # 159093

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CERTIFICATE OF SERVICE

I hereby certify that on the day stated below a copy of the foregoing MOTION TO APPROVE
LOAN MODIFICATION will be mailed by placing same in the United States Mail with sufficient
postage attached thereon to insure delivery to:

Chapter 13 Trustee: Adam Goodman, 260 Peachtree St NW #200, Atlanta, GA 30303

Ronald Faris : President/CEO Location: 1661 Worthington Road, Suite 100 West Palm Beach, Florida 33409 (by certified mail)

This 28th day of December 2016.

Purcell Law Firm, PC

S/ Matthew E. Purcell

Attorney for Debtors/Movants

Georgia Bar #159093

125 Townpark Drive Suite 300